

other readily available written descriptions. A LSP may request via the BFR process, and SWBT will provide, to the extent technically feasible, Network Elements that are greater or lesser in quality than SWBT provides to itself. (STC Appendix UNE ¶2.14.1), (Sprint Attachment 6-UNE ¶2.17.1). See also the affidavits of Mr. Deere, Ms. Ham, Ms. Lowrance and Ms. Kramer for specifics.

#### **F. Combination of Network Elements**

37. SWBT's Oklahoma agreements meet each of the FCC's requirements regarding combining network elements 47 C.F.R. §51.315. SWBT makes available unbundled network elements in a way that enables requesting telecommunications carriers to combine them to provide a telecommunications service to their customers (STC Appendix UNE ¶2.2), (Sprint Attachment O&P-UNE- ¶¶1.4 and 2.4). This may be accomplished through the use of cross-connects or standard interfaces, specifications, facilities, procedures and practices that facilitate a requesting telecommunications carrier's ability to combine network elements provided by SWBT with other network elements or with the requesting telecommunications carrier's own facilities. (See Mr. Deere's Affidavit.) SWBT also offers access to OSS functions necessary for requesting telecommunications carriers to purchase and combine network elements (STC Appendix UNE Section 10). (See Affidavits of Ms. Ham, Ms. Lowrance and Ms. Kramer.)

38. SWBT makes available to requesting telecommunications carriers the option to combine unbundled network elements with other unbundled network elements by specifying the network elements or facilities they seek to have combined, and offers a number of cross-connect options to facilitate this process. Requests for combinations that are not already being provided by SWBT will be addressed through the BFR Process discussed earlier (STC Appendix UNE ¶2.2 ¶2.2.1 & ¶11.0), (Sprint Attachment 6 UNE, ¶2.4 and ¶11.0; and Attachment 7-O&P §1.4).

**VI. CHECKLIST ITEM (iii): ACCESS TO POLES, DUCTS, CONDUITS AND  
RIGHTS-OF-WAY**

39. 47 U.S.C. §271(c)(2)(B)(iii) requires SWBT to provide nondiscriminatory access to its poles, ducts, conduits, and rights-of-way at just and reasonable rates in accordance with the requirements of section 224. SWBT makes its poles, ducts, conduits and rights-of-way (“Structure”) available for the placement of requesting telecommunications carriers' wires, cables and related facilities to the extent it may lawfully do so. SWBT's contracts satisfy 47 U.S.C. §§271 and 224 by not favoring SWBT or its subsidiaries or affiliates over requesting telecommunications carriers or any other third party. The specifics are discussed in the Affidavit of Mr. Hearst.

## **VII. CHECKLIST ITEM (iv): LOCAL LOOP TRANSMISSION**

40. SWBT makes available "local loop transmission from the central office to the customer's premises, unbundled from local switching or other services," as required by 47 U.S.C. §271(c)(2)(B)(iv). As discussed in the Affidavit of Mr. Deere, an unbundled loop is a transmission path between a distribution frame, or its equivalent, in a SWBT central office and the network interface device at the customer premises (STC Appendix UNE Section 4.0), (Brooks Fiber and USLD Appendix UNC), (Sprint Attachment 6-UNE §4), (ICG §9). This definition complies with the definition in the FCC's Rules (47 C.F.R. §§51.319(a) and (b)).
41. SWBT makes available to requesting telecommunications carriers standard unbundled loops, including 2-wire and 4-wire loops supporting analog and digital loop types. (STC Appendix UNE ¶4.2), (Sprint Attachment 6 UNE ¶4.2), (ICG §9). SWBT will consider specific requests for unbundling of other loop types through the BFR Process (STC Appendix UNE ¶4.3), (Sprint Appendix UNE ¶4.3), (ICG ¶9.4.1.). SWBT will provide access to its unbundled loops at each of SWBT's wire centers via collocation or will connect unbundled loops to other SWBT network elements, (e.g., switch ports, local switching and transport, dedicated transport, etc.), for the LSP's use in providing telephone exchange services (Brooks Fiber and USLD Appendix UNC), (STC Appendix UNE), (ICG §9), (Sprint Appendix UNE).

42. SWBT satisfies the FCC's Rules by making available unbundled access to all standard loop types. The Rules do not require any further unbundling of local loop transmission (except for NIDs, as discussed above).

### **VIII. CHECKLIST ITEM (v): LOCAL TRANSPORT**

43. Checklist Item (v) requires SWBT to unbundle local transport facilities, also called interoffice transmission facilities, that are dedicated to a particular customer or carrier or shared by more than one customer or carrier (47 U.S.C. §271(c)(2)(B)(v)); (47 C.F.R. §51.319(d)). These are facilities that provide telecommunications between wire centers or switches owned by incumbent LECs or requesting telecommunications carriers (47 C.F.R. §51.319(d)(1)), (47 U.S.C. §271(c)(2)(B)(v)), (STC Appendix UNE ¶8.0), (Sprint UNE §8). Specifics are addressed in the Affidavit of Mr. Deere.
44. SWBT will offer to requesting carriers access to unbundled dedicated interoffice transport and entrance facilities and shared transport facilities as described in Section 8 of Appendix UNE of both the STC and the Sprint Agreement. SWBT will consider requests to provide unbundled access to other interoffice transmission facilities not listed in the STC Appendix UNE through the BFR process.

45. Consistent with 47 C.F.R. §51.319(d)(2) SWBT will make available to requesting carriers access to unbundled shared interoffice transport (common transport) in exactly the same manner that SWBT provides such transport to itself and others (STC Appendix UNE ¶2.14), (Sprint UNE ¶2.17).

#### **IX. CHECKLIST ITEM (vi): LOCAL AND TANDEM SWITCHING**

46. The Checklist (47 U.S.C. §271(c)(2)(B)(vi)) and the FCC's Rules (47 C.F.R. §51.319(c)) require SWBT to unbundle local switching from transport, local loop transmission or other services. The Rules also require unbundling of local and tandem switching capabilities, including trunk-connect facilities; the basic switching function of connecting trunks to trunks; and the functions centralized in tandem switches (as opposed to end office switches) 47 C.F.R. §51.319(c)(2). SWBT offers unbundled access to unbundled local and tandem switching elements in a manner which satisfies these requirements (STC Appendix UNE, §§5 and 6), (Sprint Appendix UNE §§5 and 6). Refer to Mr. Deere's Affidavit for details.

##### **A. Local Switching**

47. As 47 U.S.C. §271(c)(2)(B)(vi) requires, SWBT makes available local switching unbundled from transport, local loop transmission and other elements. The requesting telecommunications carrier separately subscribes to or provides sufficient local loops, transport and other elements or facilities to handle traffic to and from the unbundled line-side and trunk-side ports to which it subscribes.

48. The unbundled local switching network element includes the standard switching functions of connecting lines to lines, lines to trunks, trunks to lines, and trunks to trunks (47 C.F.R. §51.319(c)(1)(i)(C)(1)), (STC Appendix UNE ¶5.1), (Sprint Appendix UNE ¶5.1). As required, the unbundled switching network element provides, on a standard basis, electronic access to all features, functions and capabilities of the switch available to SWBT's customers from that switch for the type of port connection, typically an analog line port (STC Appendix UNE ¶5.1), including:

- dial tone
- a telephone number
- one White Pages directory listing
- standard local routing and signaling
- access to 911
- access to SWBT's operator services
- access to SWBT's directory assistance

#### **B. Tandem Switching**

49. As with local switching, SWBT will provide access to tandem switching unbundled from loops, transport and other elements. Unbundled tandem switching provides requesting telecommunications carriers with access to all available basic tandem switching functions (STC Appendix UNE §6), (Sprint Appendix UNE §6). As verified by the Affidavit of Mr. Deere, we are capable of providing access to SWBT's unbundled tandem switching elements.

**X. CHECKLIST ITEM (vii): 911/E911, DIRECTORY ASSISTANCE AND**

**OPERATOR CALL COMPLETION**

**A. 911/E911**

50. Checklist Item (vii) requires that SWBT provide "[N]ondiscriminatory access to 911 and E911 Services." 47 U.S.C. §271(c)(2)(B)(vii)(I). SWBT provides customers of competitive local exchange carriers with access to the type of 911 service selected by the municipality in which they reside in a manner identical to the 911 service supplied to SWBT's customers. SWBT is furnishing access to 911 and E911 to Brooks Fiber. SWBT's 911 and E911 services are defined in the Brooks Fiber, USLD, ICG and Sprint Agreements Appendix 911. As of December 31, 1996, there were four (4) 911 trunks installed in Oklahoma from the switches owned and operated by Brooks Fiber. SWBT is currently working with other LSPs in Oklahoma on implementation plans to provide 911 trunks from their switches to applicable control offices. SWBT complies with the requirements of 47 U.S.C. §271(c)(2)(B)(vii)(I). (See Affidavit of Mr. Deere for details.)

**B. Directory Assistance And Operator Call Completion**

51. SWBT provides nondiscriminatory access to operator call completion services and directory assistance services ("OS/DA") in several different ways, as required by the Checklist, the FCC's Order and Second Report and Order, and the Rules. In addition, SWBT provides

OS and DA as unbundled network elements pursuant to 47 C.F.R. §51.319 (g) and 47 U.S.C. §271(c)(2)(B)(vii)(II) and (III). For details refer to the Affidavit of Mr. Keener.

#### **XI. CHECKLIST ITEM (viii): WHITE PAGES LISTINGS**

- 52.** Section 271(c)(2)(B)(viii) of the Act requires SWBT to provide "[W]hite pages directory listings for customers of the other carrier's telephone exchange service." SWBT satisfies this requirement by ensuring that its directory publishing affiliate will publish the primary listing of the LSP's customer located within the geographic scope of SWBT's White Pages directories. These listings will be inter-filed with the listings of SWBT customers. In addition to providing listings, SWBT has agreed to provide initial and secondary delivery of White Pages directories to customers of resellers on the same basis as its own customers. SWBT has also agreed to deliver White Page directories to customers of facility-based carriers, or upon a carrier's request, SWBT will deliver directories in bulk to a single address designated by the requesting carriers. Finally, SWBT will provide access to its White Pages directory listings in readily accessible magnetic tape or electronic format as required by 47 C.F.R. §51.217(c)(3)(ii). Ms. Baker-Oliver addresses, in further detail in her affidavit, how SWBT has complied with the Act and FCC Rules pertaining to access to White Pages.



**XII. CHECKLIST ITEM (ix): NUMBERING ADMINISTRATION**

53. Checklist Item (ix) requires that SWBT provide, "[U]ntil the date by which telecommunications numbering administration guidelines, plans, or rules are established, nondiscriminatory access to telephone numbers for assignment to the other carrier's telephone exchange service customers." 47 U.S.C. §271(c)(2)(B)(ix) The Rules (§51.217(e)(i)), in turn, require that a LEC permit competing providers to have access to telephone numbers that is identical to the access the LEC provides to itself.
54. SWBT makes available nondiscriminatory access to telephone numbers for assignment to other carriers' telephone exchange service customers. Until a new numbering administration process is in place, SWBT is continuing to act as the Central Office Code Administrator in Oklahoma in accordance with the Central Office Code Assignment Guidelines and the NPA Code Relief Planning Guidelines or their successors under the oversight and complaint jurisdiction of the FCC and the OCC (47 C.F.R. §51.217(a)(2)). In the meantime, SWBT continues to support efforts to transfer its number administration responsibilities to a neutral third party. Refer to the Affidavit of Mr. Adair for more details.

**XIII. CHECKLIST ITEM (x): ACCESS TO DATABASES AND ASSOCIATED**

**SIGNALING NECESSARY FOR CALL ROUTING AND COMPLETION**

55. Both the Checklist (47 U.S.C. §271(c)(2)(B)(x)) and Rules (§51.319(e)) require SWBT to provide nondiscriminatory access to signaling networks and call-related databases. SWBT's interconnection agreements provide for nondiscriminatory access to its signaling networks and call-related databases used for call routing and completion (Brooks Fiber and USLD Appendix SS7); (STC, Appendices CNAM, SS7, LIDB, LIDB-V, 800, AIN), (Sprint Appendix UNE §9), (ICG Appendix SS7). Refer to the Affidavit of Mr. Deere for details. Effective March 11, 1997, the SWBT interstate Access Tariff was modified to additionally provide the transport of SS7 messages throughout the SWBT signaling network..
56. SWBT has agreed to provide access to call-related databases and signaling to several carriers, including Brooks Fiber, Sprint, ICG and USLD, and currently makes this available through its Access Tariffs.

**XIV. CHECKLIST ITEM (xi): INTERIM NUMBER PORTABILITY**

57. Checklist Item (xi) requires that "[U]ntil the date by which the Commission issues regulations pursuant to section 251 to require number portability," SWBT must provide "interim telecommunications number portability through remote call forwarding, direct

inward dialing trunks, or other comparable arrangements, with as little impairment of functioning, quality, reliability, and convenience as possible." 47 U.S.C. §271(c)(2)(B)(xi). SWBT also must fully comply with regulations issued by the FCC under 47 U.S.C. §251. SWBT meets this requirement. Refer to the Affidavit of Mr. Deere for details.

58. As required by the FCC, SWBT will recover the costs of providing interim number portability in a competitively neutral manner established by the OCC (STC Appendix PORT). In the meantime, SWBT has entered into agreements to defer collection of charges from all requesting telecommunications carriers for the incremental costs of interim number portability and has requested proceedings before the OCC to determine a method of cost recovery for interim number portability. SWBT also proposes that all incumbent and new LECs keep track of their costs of providing such number portability. When the OCC approves interim recovery measures, SWBT will comply with those measures.
59. SWBT has made available to Brooks Fiber, USLD, ICG and Sprint interim number portability ("INP") via Remote Call Forwarding and Direct Inward Dialing. These INP provisions are available to all other requesting telecommunications carriers under the same nondiscriminatory terms, conditions and prices. (See Affidavit of Ms. Baker-Oliver for details). Implementation of long-term number portability is scheduled to begin in

Oklahoma in the third quarter of 1998, pursuant to the requirements of the FCC's Number Portability Order CC-Docket 95-116 released on March 11, 1997.

**XV. CHECKLIST ITEM (xii): LOCAL DIALING PARITY**

60. Checklist Item (xii) requires that SWBT provide "[N]ondiscriminatory access to such services or information as are necessary to allow the requesting carrier to implement local dialing parity in accordance with the requirements of Section 251(b)(3)" 47 U.S.C. §271(c)(2)(B)(xii). Whereas 47 U.S.C. §251(b)(3), in turn, imposes on SWBT the duty to offer all other providers of telephone exchange service and telephone toll service "nondiscriminatory access to telephone numbers, operator services, directory assistance, and directory listings, with no unreasonable dialing delays." SWBT meets all these requirements. (See to the Affidavit of Mr. Deere for additional details.)
61. Compliance with local dialing parity requirements can best be assessed from the perspective of a customer of a competing provider of local exchange service. As a result of the integration arrangements between SWBT and, for example, Brooks Fiber, a customer who has subscribed to local exchange service from Brooks Fiber in Tulsa can make a local call to a local exchange customer of SWBT within the same exchange without dialing any extra digits or access codes, and without any additional perceivable delay, the same as a call made between two similarly located Brooks Fiber end users or between two SWBT users.

In other words, as a result of the services and information provided by SWBT and, correspondingly, the services and information provided by Brooks Fiber, the same seven-digit dialing pattern and dialing times for local calls applies between customers of the respective companies in the same manner as it applies between customers of the same company.

62. SWBT's local dialing parity arrangement is outlined in the Brooks Fiber, USLD and ICG agreements, as well as, the STC. Specifics are addressed in Mr. Deere's Affidavit.

**XVI. CHECKLIST ITEM (xiii): RECIPROCAL COMPENSATION**

63. Reciprocal Compensation refers to the billing and payment arrangement that recovers costs incurred for the transport and termination of calls originating on one party's network and terminating on the other party's network. The Act and Rules require SWBT and interconnecting telecommunications carriers to establish arrangements for reciprocal compensation. SWBT's reciprocal compensation terms comply with 47 U.S.C. §§271(c)(2)(B)(xiii), 251(b)(5), 252(d)(2) and the FCC's Rules and thereby satisfy the Checklist. (See the Affidavit of Mr. Moore for additional costing details.)

64. SWBT offers mutual and reciprocal compensation rates for both tandem office-based and end office-based transport and termination of local traffic originating on the other carrier's network (STC Section III) and (Sprint Attachment 12: Compensation §3.0).

**XVII. CHECKLIST ITEM (xiv): RESALE**

65. The Checklist requires SWBT to demonstrate that its retail telecommunications services are “. . . available for resale in accordance with the requirements of sections 251(c)(4) and 252(d)(3)” 47 U.S.C. §271(c)(2)(B)(xiv). Whereas 47 U.S.C. §251(c)(4), in turn, requires incumbent LECs to offer for resale at wholesale rates any telecommunications service that the carrier provides at retail to subscribers who are not telecommunications carriers, and not to prohibit such resale nor impose unreasonable or discriminatory conditions on resale of such services. SWBT's agreements fully satisfy these requirements by making available to resellers the “Resale Services.” These services include retail telecommunications services provided by SWBT that are subject to the resale obligation under the FCC's Rules. In addition, SWBT has made several other services available for resale, beyond the requirements of the Act and the Rules (e.g. Additional directory listings, suspension of services, and Bill plus). The services provided for resale are equal-in-quality, provided within the same provisioning intervals (see Affidavit of Ms. Ham) and subject to the same terms and conditions applicable to retail customers. The agreements approved by the OCC include existing retail use limitations for wholesale application. Furthermore, the

Arbitrator recommended that existing retail use limitations are appropriate for wholesale applications 47 C.F.R. §§51.603, 51.613, 51.615. The OCC has agreed with the arbitrator's recommendations. (See the Affidavit of Mr. Moore for costing details.)

66. SWBT is currently furnishing resale services to Brooks Fiber and Dobson Wireless. In addition, the OCC has approved resale agreements with Sprint, USLD and WOLD. SWBT also has completed resale agreements with Fast Connections, CapRock Communications, Comm South, ICI, Preferred Carrier Services, Sterling International Funding d/b/a/ Reconex and U.S. Telco.

#### **XVIII. INTRALATA TOLL DIALING PARITY**

67. IntraLATA toll dialing parity is not a Checklist requirement and is not required until SWBT actually begins providing in-region interLATA service 47 U.S.C. §271(e)(2)(A). SWBT will provide intraLATA toll dialing parity in each SWBT exchange in Oklahoma coincident with its offering in-region interLATA service in those exchanges. All affected operating support systems already have been modified to support intraLATA toll dialing parity. Dual PIC software is currently being loaded in all SWBT switches. SWBT is developing carrier-neutral operational, administrative and other processes to implement customer selection of another intraLATA toll carrier and to provide intraLATA toll dialing parity. An intraLATA Toll Dialing Parity Implementation Plan will be filed with the OCC as per

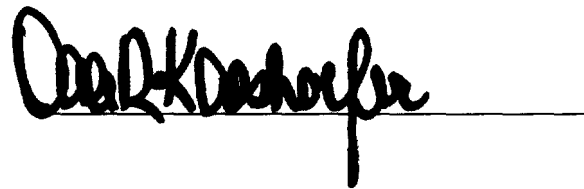
requirements of the Act and Second Report and Order. SWBT's tariff and implementation plan fully meets the intraLATA toll dialing parity requirements of the Act and Order.

### **XIX. CONCLUSION**

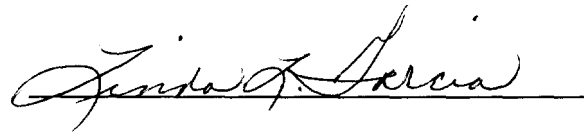
68. As explained herein, SWBT's products, services and unbundled network elements, through its STC and its OCC approved interconnection agreements with Brooks Fiber, Sprint, ICG and USLD, satisfy each element of the Act's Competitive Checklist. Further, SWBT is either furnishing or stands ready to provide every Checklist Item to any requesting telecommunications carrier for the provision of telephone exchange and exchange access service in compliance with 47 U.S.C. §§251 and 252 and the Rules. This concludes my affidavit.



The information contained in this affidavit is true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read "Carl Koehnke", written over a horizontal line.

Subscribed and sworn to before me this 8 day of April, 1997.

A handwritten signature in black ink, appearing to read "Linda L. Garcia", written over a horizontal line.

My commission expires:

LINDA L GARCIA  
NOTARY PUBLIC STATE OF MISSOURI  
ST. LOUIS CITY  
MY COMMISSION EXP. JULY 23, 2000



**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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In the Matter of

Application of SBC Communications, Inc.,  
Southwestern Bell Telephone Company, and  
Southwestern Bell Communications Services, Inc.,  
d/b/a Southwestern Bell Long Distance, for  
Provision of In-Region, InterLATA Services in  
Oklahoma

CC Docket No. \_\_\_\_\_

**AFFIDAVIT OF RICHARD K. KEENER  
ON BEHALF OF SOUTHWESTERN BELL TELEPHONE COMPANY**

**STATE OF TEXAS            )**  
  **)   §**  
**COUNTY OF DALLAS        )**

I, Richard K. Keener, being first duly sworn upon oath, do hereby depose and state as follows:

1. My name is Richard K. Keener. My business address is One Bell Plaza, Room 3420, Dallas, Texas 75202. I am employed by Southwestern Bell Telephone Company (SWBT) as Director-Operator Services (Product Support). In this position, I am responsible for providing technology planning and operational support to SWBT's Operator Services organization in Arkansas, Kansas, Oklahoma, Missouri and Texas.

## **PROFESSIONAL EXPERIENCE AND EDUCATION**

2. Upon completion of my primary education, I attended Virginia Polytechnic Institute and State University in Blacksburg, Virginia, where I received a B.S. in Business Administration in June, 1966.
3. I was initially employed by the Bell System in 1966. Since that time, I have held various positions in the Operator Services department. My most recent and current assignment as Director-Operator Services (Product Support) on the Company's Operator Services staff commenced in August, 1985.

## **PURPOSE OF AFFIDAVIT**

4. The purpose of my affidavit is to explain how SWBT is in compliance with 47 U.S.C. §§271(c)(2)(B)(II) and (III) of the Telecommunications Act of 1996 (hereinafter "the Act") as it pertains to non-discriminatory access to Operator Call Completion Services (hereinafter "OS") and Directory Assistance (hereinafter "DA") Services. Southwestern Bell provides non-discriminatory access to OS and DA Services in several different ways, as required by 47 U.S.C. § 271 (c)(2) (B) (hereinafter "Checklist"), FCC 96-333 Second Report and Order and Memorandum Opinion And Order (hereinafter "Second Report and Order"), and CC Docket 96-98, Appendix B - Rules, Amendments to the Code of Federal Regulations (C.F.R), Part 51, Subpart D (hereinafter "the FCC Rules"). I use the phrase "operator services" in the same sense as it is defined in the FCC's Second Report and Order at ¶¶108 and 109. The FCC, in

that Order, defines operator services as “any automatic or live assistance to a consumer to arrange for billing or completion, or both, of a telephone call through a method other than: (1) automatic completion with billing to the telephone from which the call originated; or (2) completion through an access code by the consumer, with billing of an account previously established with the telecommunications service provider by the consumer.”

5. I will describe how SWBT has provided Operator Services and Directory Assistance through access to unbundled facilities and functionalities, pursuant to 47 C.F.R. §51.319(g). Further, I will explain how SWBT provides DA, Directory Assistance Call Completion (DACC), Operator Call Completion Services and Line Information Database (LIDB) services to Incumbent local Exchange Carriers (ILECs) and Local Service Providers (LSPs) in a manner that is equal to that in which SWBT provides such services to itself. (STC, Appendices DA, OS, & LIDB; Brooks Fiber §6(D), Appendix DA, §6(F), Appendix OS) Specifically, I am testifying in support of Appendices DA, OS, Direct and LIDB filed as part of the Oklahoma Statement of Terms and Conditions (STC).
6. As outlined in the Second Report and Order at ¶102, SWBT has a duty to provide “nondiscriminatory access” to operator services, directory assistance, and directory listings, to competing providers that is at least equal in quality to the access that SWBT provides itself. SWBT complies with the requirements of the Act, the FCC Rules and the Second Report and Order in making available such access. Evidence of SWBT’s compliance can be found in the STC, Appendices OS, DA, Direct and DAL and in the

following Interconnection Agreements: Sprint, USLD, Brooks Fiber, ICI, & ICG Appendices DA, OS & Resale. SWBT further provides nondiscriminatory access to OS and DA to LSPs reselling SWBT's local exchange service. (WOLD, Dobson Wireless). With respect to providing nondiscriminatory access to directory assistance listings, SWBT provides such access by allowing competing providers to obtain read-only access to its directory assistance databases. (Second Report and Order ¶143) (STC Appendix Direct). Direct Access allows LSPs access to SWBT's DA database (which includes residence, business, and government listings) for the purpose of providing voice DA to LSP end users. This service allows the LSPs to obtain listed name, address, zip code and telephone numbers, excluding non-published listing information. (Second Report and Order ¶144) With Direct Access, an LSP queries and views the same directory listing information available to SWBT's own directory assistance operators. In addition to making available "direct access" to its DA databases, SWBT also provides access to directory listings via a "mutual licensing agreement." (STC, Appendix DAL, Sprint, Attachment 18: Mutual Exchange of Directory Listings Information)

#### **DIRECTORY ASSISTANCE SERVICES**

7. DA is a service that allows customers to obtain telephone numbers of other customers. The end-user customer receives this service by dialing 1-411, 1-555-1212, and 1-(Area Code)-555-1212. DACC is an optional service which allows a DA customer to direct that a call be automatically completed to a number obtained from DA without dialing the number.

8. LSPs who provide local exchange service through resale, over some combination of their own facilities and unbundled SWBT switching, or entirely through their own facilities, have several options with respect to the provision of local directory assistance to their customers. The following outlines the available options:

- **RESALE SERVICES** - SWBT will provide an LSP's end users access to DA services as part of the resold local exchange services; or the LSP may choose to "customize route" the DA calls to a DA platform designated by the LSP.
- **UNBUNDLED LOCAL SWITCHING** - LSPs providing local exchange service utilizing a combination of their own facilities and SWBT's unbundled local switching may choose to purchase DA services on a per call basis from SWBT; or the LSP may choose to "customize route" the DA calls to a DA platform designated by the LSP.
- **PURE FACILITIES BASED PROVIDERS** - LSPs providing local exchange service solely through their own facilities may choose to contract with SWBT for the provision of DA services to their end users, may opt to contract with another DA provider, or may choose to provide their own local DA services.

9. SWBT currently provides nondiscriminatory access to DA services to entities other than its own end user customers that is equal in quality to the services that SWBT provides to its own customers. 47 C.F.R. § 51.217 (a)(2). STC Appendix DA. SWBT currently makes available or provides access to these services under contract on behalf of a number of ILECs and LSPs. As outlined in Kaeshoefer, Schedule 1, in Oklahoma, LSPs currently contracting with SWBT for DA Services include Brooks Fiber Communications and Sprint. Brooks Fiber § 6D, Appendix DA. Sprint Attachment 22: DA (Other) SWBT-Provided Directory Assistance. SWBT offers LSPs the same terms and conditions for DA services SWBT offers to ILECs. The prices shown for DA Services in Appendix Pricing Schedule are the same that are offered to

ILECs in Oklahoma today. As outlined in STC Appendix DA, the Directory Assistance Services provided to requesting carriers include:

- Directory Assistance, which consists of providing subscriber listing information name, address, and published telephone number or an indication of “non-published” status) to LSP’s end users who dial 411 or NPA 555-1212.
- Directory Assistance Call Completion, which is an optional service in which SWBT completes a call to the requested number on behalf of an LSP’s end user, utilizing an automated voice system or with operator assistance.
- Call Rating/Reference Information, which is a service where SWBT will quote the LSP’s DA rates to the end user upon request. It is the LSP’s responsibility to provide SWBT it’s current DA rates. 47 C.F.R. §51.217 (c)(3)(iv).

10. The LSP is billed the contracted rate for each call handled by SWBT or, in the case of DACC, each call completed by SWBT. The access arrangements enable all requesting carriers to offer their subscribers the ability to gain access to Southwestern Bell’s DA Services through prevailing dialing arrangements with no unreasonable dialing delay. 47 C.F.R. §51.217(b). SWBT provides nondiscriminatory access to Directory Assistance Services pursuant to 47 U.S.C. § 251 (b)(3) of the Federal Act and the FCC’s Rules issued in CC Docket 96-98. 47 C.F.R. § 51.217(c)(3)(i).
11. If an LSP chooses to provide its own DA service, SWBT will negotiate a reciprocal licensing agreement, whereby an LSP can receive SWBT listings for use in providing DA services to its customers. 47 C.F.R. § 51.217 (c)(3)(ii). Sprint Attachment 18: Mutual Exchange of Directory Listing Information. As outlined in STC Appendix DAL, the LSP would furnish to SWBT the directory listings for the LSP customers.



The price structure is on a per listing basis. A listing is defined as customer name, address and published telephone number, or an indication of "non-published" status.

The Companies will exchange listing information to maintain the completeness of their respective DA databases. This is consistent with the FCC's rule that any customer should be able to access any listed number on a nondiscriminatory basis, notwithstanding the identity of the customer's local service provider or the identity of the telephone service provider for the customer whose directory listing is requested.

47 C.F.R. §51.217 (c)(3)(i).

#### **OPERATOR CALL COMPLETION SERVICES**

12. Operator call completion services refer to a variety of call services that are obtained by dialing "0-" (dialing only the digit 0), 0+ a local number, or 0+ a toll number. These services include access to alternate billing services (i.e., billing to a telephone calling card, credit card, third number or collect), assistance in dialing a call which is billed to the originating line (i.e., customer has encountered trouble dialing a 1+ call or customer wishes to place a person-to-person call), busy line verification (BLV) and emergency interrupt (EI).
13. LSPs who provide local exchange service through resale, over some combination of their own facilities and SWBT unbundled switching, or entirely through their own facilities, have several options with respect to the provision of operator call completion service to their customers. The following outlines the available options:
  - **RESALE SERVICES** - SWBT will provide LSPs end users access to Operator Call Completion Services as part of resold local exchange services; or the LSP may choose to "customize route" the calls to an Operator Services platform designated by the LSP.